

**QUINN EMANUEL URQUHART & SULLIVAN, LLP**

Kevin Y. Teruya (Bar No. 235916)  
kevinteruya@quinnemanuel.com  
865 South Figueroa Street, 10<sup>th</sup> Floor  
Los Angeles, CA 90017  
(213) 443-3000

**HAGENS BERMAN SOBOL SHAPIRO LLP**

Shana E. Scarlett (Bar No. 217895)  
shanas@hbsslaw.com  
715 Hearst Avenue, Suite 202  
Berkeley, CA 94710  
(510) 725-3000

*Interim Co-Lead Consumer Class Counsel*

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

This Document Relates To: All Actions

Consolidated Case No. 3:20-cv-08570-JD

**CONSUMER PLAINTIFFS' INTERIM  
ADMINISTRATIVE MOTION TO  
PROVISIONALLY FILE UNDER SEAL  
MATERIALS IN SUPPORT OF  
CONSUMER PLAINTIFFS' OPPOSITION  
TO FACEBOOK'S MOTION TO  
EXCLUDE TESTIMONY OF NICHOLAS  
ECONOMIDES**

The Hon. James Donato

Hearing Date: Dec. 14, 2023 at 10:00 a.m.

1 Pursuant to the Court's September 20, 2023 Order granting the parties' stipulation to modify  
2 the sealing procedures applicable to class certification and related *Daubert* briefing, Dkt. 656,  
3 Consumer Plaintiffs ("Consumers") submit this interim administrative motion to provisionally file  
4 under seal the unredacted version of Consumers' Opposition to Facebook's Motion to Exclude the  
5 Testimony of Nicholas Economides, and certain exhibits submitted as attachments to the  
6 Declaration of Kevin Y. Teruya in support of Consumers' Opposition. Consistent with the Court's  
7 September 20, 2023 Order, Consumers will further describe the reasons for the requested sealing in  
8 a forthcoming omnibus sealing motion to be filed by November 21, 2023. In the interim, Consumers  
9 respectfully request that the Court provisionally maintain under seal the requested materials.

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 DATED: October 13, 2023

2 By: /s/ Shana E. Scarlett

3 **HAGENS BERMAN SOBOL SHAPIRO LLP**

4 Shana E. Scarlett (Bar No. 217895)

5 shanas@hbsslw.com

6 715 Hearst Avenue, Suite 202

7 Berkeley, CA 94710

8 (510) 725-3000

9 Steve W. Berman (admitted *pro hac vice*)

10 steve@hbsslw.com

11 1301 Second Avenue, Suite 2000

12 Seattle, WA 98101

13 (206) 623-7292

14 *Interim Co-Lead Consumer Class Counsel*

15 **LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

16 W. Joseph Bruckner (admitted *pro hac*  
17 *vice*)

18 wjbruckner@locklaw.com

19 Robert K. Shelquist (admitted *pro hac*  
20 *vice*)

21 rkshelquist@locklaw.com

22 Brian D. Clark (admitted *pro hac vice*)

23 bdclark@locklaw.com

24 Rebecca A. Peterson (Bar No. 241858)

25 rapeterson@locklaw.com

26 Kyle Pozan (admitted *pro hac vice*)

27 kjpozan@locklaw.com

28 Laura M. Matson (admitted *pro hac vice*)

lmmatson@locklaw.com

100 Washington Avenue South, Suite  
2200

Minneapolis, MN 55401

(612) 339-6900

*Interim Counsel for the Consumer Class*

By: /s/ Kevin Y. Teruya

**QUINN EMANUEL URQUHART & SULLIVAN,  
LLP**

Kevin Y. Teruya (Bar No. 235916)

kevinteruya@quinnemanuel.com

Adam B. Wolfson (Bar No. 262125)

adamwolfson@quinnemanuel.com

Scott L. Watson (Bar No. 219147)

scottwatson@quinnemanuel.com

Claire D. Hausman (Bar No. 282091)

clairehausman@quinnemanuel.com

Brantley I. Pepperman (Bar No. 322057)

brantleypepperman@quinnemanuel.com

865 South Figueroa Street, 10th Floor

Los Angeles, CA 90017-2543

(213) 443-3000

Michelle Schmit (admitted *pro hac vice*)

michelleschmit@quinnemanuel.com

191 N. Wacker Drive, Suite 2700

Chicago, IL 60606-1881

(312) 705-7400

Manisha M. Sheth (admitted *pro hac vice*)

manishasheth@quinnemanuel.com

51 Madison Avenue, 22nd Floor

New York, New York 10010

(212) 849-7000

*Interim Co-Lead Consumer Class Counsel*

**ATTESTATION OF KEVIN Y. TERUYA**

This document is being filed through the Electronic Case Filing (ECF) system by attorney Kevin Y. Teruya. By his signature, Mr. Teruya attests that he has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

Dated: October 13, 2023

By /s/ Kevin Y. Teruya  
Kevin Y. Teruya

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of October 2023, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System, causing it to be electronically served on all attorneys of record.

By /s/ Kevin Y. Teruya  
Kevin Y. Teruya